

1 QIANWU YANG (Cal. Bar No. 336610)
yang@shm.law

2 YI YI (Cal. Bar No. 353482)
yi.yi@shm.law

3 **SHM LAW FIRM**

3000 El Camino Real

4 Building 4, Suite 200

Palo Alto, CA 94306

5 Telephone: (650) 613-9737

6 *Attorneys for Plaintiffs*

iBeauty Limited Company,

7 Dongguan Xianghuo Trading Co., Ltd.,

Dongguan Laiyang Trading Co., Ltd.,

8 Guangzhou Linyu Trading Co., Ltd.,

Guangzhou Lincan Electronic Technology Co., Ltd., and

9 Guangzhou Senran Electronic Technology Co., Ltd.

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

12 iBeauty Limited Company, Dongguan
13 Xianghuo Trading Co., Ltd., Dongguan
Laiyang Trading Co., Ltd., Guangzhou
14 Linyu Trading Co., Ltd., Guangzhou
Lincan Electronic Technology Co.,
15 Ltd., and Guangzhou Senran Electronic
Technology Co., Ltd.

16 Plaintiffs,

17 v.

18 Dbest Products Inc.,

19 Defendant.

**COMPLAINT FOR DECLARATORY
JUDGMENT**

DEMAND FOR JURY TRIAL

1 Plaintiffs iBeauty Limited Company, Dongguan Xianghuo Trading Co., Ltd.,
2 Dongguan Laiyang Trading Co., Ltd., Guangzhou Linyu Trading Co., Ltd.,
3 Guangzhou Lincan Electronic Technology Co., Ltd and Guangzhou Senran
4 Electronic Technology Co., Ltd. (collectively, “Plaintiffs”), hereby file this
5 Complaint against Defendant Dbest Products Inc., and allege as follows:

6 **NATURE OF THE ACTION**

7 1. This action arises under the Declaratory Judgment Act, 28 U.S.C. §
8 2201 *et seq.*, and the United States Patent Act, 35 U.S.C. § 1 *et seq.* Plaintiffs seek
9 declaratory judgments that U.S. Patent No. 12,103,576 (“the ’576 Patent”) is not
10 infringed by Plaintiffs’ products (“Non-Infringing Products”). True and correct
11 copies of the ’576 Patent is attached hereto as Exhibit 1.

12 2. Plaintiffs bring this action in view of the actual controversy created by
13 Defendant under the ’576 Patent. Defendant has asserted a patent infringement
14 claim against Plaintiffs’ products with Amazon, causing Amazon to remove
15 Plaintiffs’ listings for Plaintiffs’ Non-Infringing Products on Amazon.com.

16 **PARTIES**

17 3. Plaintiff iBeauty Limited Company is a corporation organized under
18 Colorado law with its principal place of business at 11769 Valley Boulevard,
19 Apartment 2203, El Monte, CA 91732-3037, USA.

20 4. Plaintiff Dongguan Xianghuo Trading Co., Ltd. is a Chinese company,

1 with a principal place of business at Room 403, No.22, Zenhua Road, Humen
2 District, Humen Town, Dongguan, Guangdong, China.

3 5. Plaintiff Dongguan Laiyang Trading Co., Ltd., Ltd. is a Chinese
4 company, with a principal place of business at Room 301, No. 8, Lane 9, Zexu
5 Datang, Humen Town, Dongguan, Guangdong, China.

6 6. Plaintiff Guangzhou Linyu Trading Co., Ltd. is a Chinese company,
7 with a principal place of business at 206, Building 9, No. 313 Guangyun Road, Jiahe
8 Street, Baiyun District, Guangzhou, Guangdong, China.

9 7. Plaintiff Guangzhou Lincan Electronic Technology Co., Ltd. is a
10 Chinese company, with a principal place of business at No.41, Yunlong Road,
11 Baiyun District, Guangzhou, China.

12 8. Plaintiff Guangzhou Senran Electronic Technology Co., Ltd. is a
13 Chinese company, with a principal place of business at Room 401, No.12, Danyuan
14 1 Henglu, Pengshang, Lianbian, Baiyun District, Guangzhou, China.

15 9. Upon information and belief, Dbest Products Inc. is a corporation
16 organized under California law with its principal place of business at 16506 South
17 Avalon Boulevard, Carson, CA 90746, USA.

18 **JURISDICTION AND VENUE**

19 10. This action arises under the Declaratory Judgment Act, 28 U.S.C. §
20 2201, *et seq.*, the United States Patent Act, 35 U.S.C. § 1, *et seq.* This Court has

1 subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 2201, 2202,
2 1331, and 1338(a) because an actual case or controversy currently exists between
3 the Parties regarding the subject matter of this action, and the Court would have
4 subject matter jurisdiction over this action if Defendant initiated suit for patent
5 infringement.

6 11. The Court has personal jurisdiction over Dbest Products Inc. based on
7 information and belief that Dbest Products Inc. is domiciled in California and within
8 this judicial district.

9 12. Venue is proper in this Court under 28 U.S.C. § 1391(b)(1), because
10 Dbest Products Inc. resides in this district as residency is defined in 28 U.S.C. §
11 1391(c)(2).

12 **FACTUAL BACKGROUND**

13 **A. The Plaintiffs' Non-Infringing Products.**

14 13. Plaintiff iBeauty Limited Company sells storage bins on
15 Amazon.com under the storefront "IBEAUTY LIMITED COMPANY." The models
16 of the storage bins sold by iBeauty Limited Company at issue are 1579-4 pack,
17 1579-3 pack and 1579-4 pack-middle size. The corresponding ASINs are
18 B0CHRNM2YF, B0B67PCFLQ and B0DCDQSNF5.

19 14. On or about December 9, 2024, iBeauty Limited Company received a
20 notification from Amazon. This notice informed iBeauty Limited Company that

1 Amazon removed its listings of ASINs above, because of the alleged infringement
2 of the '576 Patent.

3 15. Plaintiff Dongguan Xianghuo Trading Co., Ltd. sells storage bins on
4 Amazon.com under the storefront "XIANGHUO." The models of the storage bins
5 sold by Dongguan Xianghuo Trading Co., Ltd. at issue are 1579-4 pack, 1579-3
6 pack, 1579-4 pack-large size, 1579-3 pack-large size, 1916 and 1585. The
7 corresponding Amazon Standard Identification Numbers ("ASINs") are
8 B0CHRP96MS, B0CC5YKT2T, B0DFC3N33Y, B0CFQG78HJ, B0CGZP8NMX
9 and B0D6QRMDQ6.

10 16. On or about December 6 and December 12, 2024, Dongguan
11 Xianghuo Trading Co., Ltd. received a notification from Amazon. This notice
12 informed Dongguan Xianghuo Trading Co., Ltd. that Amazon removed its listings
13 of ASINs above, because of the alleged infringement of the '576 Patent.

14 17. Plaintiff Dongguan Laiyang Trading Co., Ltd. sells storage bins on
15 Amazon.com under the storefront "LYUSDD." The models of the storage bins sold
16 by Dongguan Laiyang Trading Co., Ltd. at issue are 1916 and 1985. The
17 corresponding ASINs are B0BQ3H7PT8 and B0D93CZZRD.

18 18. On or about November 27, 2024, Dongguan Laiyang Trading Co.,
19 Ltd. received a notification from Amazon. This notice informed Dongguan Laiyang
20 Trading Co., Ltd. that Amazon removed its listings of ASINs above, because of the

1 alleged infringement of the '576 Patent.

2 19. Plaintiff Guangzhou Linyu Trading Co., Ltd. sells storage bins on
3 Amazon.com com under the storefront "LINYU-US." The models of the storage
4 bins sold by Guangzhou Linyu Trading Co., Ltd. at issue are 1916 and 1985. The
5 corresponding ASINs are B0CGZNGC36 and B0D7HJLRXM.

6 20. On or about December 9, 2024, Guangzhou Linyu Trading Co., Ltd.
7 received a notification from Amazon. This notice informed Guangzhou Linyu
8 Trading Co., Ltd. that Amazon removed its listings of ASINs above, because of the
9 alleged infringement of the '576 Patent.

10 21. Plaintiff Guangzhou Lincan Electronic Technology Co., Ltd. sells
11 storage bins on Amazon.com com under the storefront "jolyhome." The models of
12 the storage bins sold by Guangzhou Lincan Electronic Technology Co., Ltd. at issue
13 are 1916 and 1985. The corresponding ASINs are B0BQ3H7PT8 and
14 B0D93CZZRD.

15 22. On or about November 27, 2024, Guangzhou Lincan Electronic
16 Technology Co., Ltd. received a notification from Amazon. This notice informed
17 Guangzhou Lincan Electronic Technology Co., Ltd. that Amazon removed its
18 listings of ASINs above, because of the alleged infringement of the '576 Patent.

19 23. Plaintiff Guangzhou Senran Electronic Technology Co., Ltd. sells
20 storage bins on Amazon.com com under the storefront "senran-US." The models of

1 the storage bins sold by Guangzhou Senran Electronic Technology Co., Ltd. at issue
2 are 1916 and 1985. The corresponding ASINs are B0CGZNGC36 and
3 B0D7HJLRXM.

4 24. On or about December 9, 2024, Guangzhou Senran Electronic
5 Technology Co., Ltd. received a notification from Amazon. This notice informed
6 Guangzhou Senran Electronic Technology Co., Ltd. that Amazon removed its
7 listings of ASINs above, because of the alleged infringement of the '576 Patent.

8 25. The Amazon marketplace constitutes Plaintiffs' primary sales channel
9 into the United States. To remain competitive in the United States market for storage
10 bins, Plaintiffs need those Non-Infringing Products listed in the Amazon
11 marketplace. Amazon has removed Plaintiffs' Non-Infringing Products from the
12 marketplace, preventing Plaintiffs from accessing their largest channel of trade
13 because of Defendant's alleged infringement complaint to Amazon. Thus,
14 Defendant's submission of Amazon infringement complaint has caused immediate
15 and substantial harm to Plaintiffs.

16 **B. U.S. Patent NO. 12,103,576.**

17 26. The '576 Patent lists Dbest Products Inc. as the applicant and
18 assignee. *See* Exhibit 1, the '576 Patent, cover page.

19 27. The '576 Patent, titled "Stackable Collapsible Carts," describes its
20 purported invention as an enhanced "collapsible cart designed to transition from a

1 closed, folded condition to an open, expanded condition for use.”

2 28. The application for the ’576 Patent was filed on December 15, 2023.
3 The ’576 Patent was issued on October 1, 2024.

4 29. Claims 1, 11 and 15 are the only independent claims of the ’576
5 Patent.

6 30. Claim 1 requires:

7 a first track formed along the first right panel and the second right
8 panel extending from a first position on the first right panel to a
9 second position on the second right panel; and

10 a first slideable member cooperatively engaged to the first track, the
11 first slideable member is movable along the first track between an
12 open position to a closed position to selectively lock the first right
13 panel to the second right panel, wherein the first slideable member is
14 in the open position when disposed along the first track adjacent the
15 first position of the first track while not disposed along the second
16 right panel and is in the closed position when disposed along the first
17 track adjacent the second position of the first track while being
18 disposed across both the first right panel and second right panel.

19 *See* Exhibit 1 at 11:52-67.

20 31. Claim 11 requires:

1 the right sidewall comprising a first right panel rotatably coupled to a
2 second right panel, the right sidewall further comprising a third right
3 panel, wherein the second right panel and the third right panel
4 conform in shape to collectively cover the opening in the first right
5 panel and, the second right panel comprises a ribbed wall with a
6 plurality of ribs; and
7 a first lock assembly integrated with the first right panel and the
8 second right panel, the first lock assembly having a first condition for
9 locking the first right panel to the second right panel, and a second
10 condition for unlocking the first right panel from the second right
11 panel.

12 *See Exhibit 1 at 12:63-13:9.*

13 32. Claim 15 requires:

14 the rigid top cover has an indentation pattern being at least
15 substantially aligned with the vertical axis of the wheel assembly, the
16 indentation pattern configured to receive a wheel assembly from
17 another identical collapsible cart when stacked vertically.

18 *See Exhibit 1 at 14:12-16.*

19 **COUNT I**

20 **Declaratory Judgment of Non-Infringement - the '576 Patent**

1 33. Plaintiffs repeat and reallege each of the preceding paragraphs as if
2 they are restated here and incorporate them by reference.

3 34. The manufacture, use, offer for sale, sale, and/or import of Plaintiffs'
4 storage bins, including without limitation the Non-Infringing Products, have not
5 infringed and will not infringe, directly or indirectly, literally or under the doctrine
6 of equivalents, any valid claim of the '576 Patent.

7 35. Plaintiffs' Non-Infringing Products do not meet all limitations of
8 claim 1, at least because they lack the "a first track" limitation.

9 36. Plaintiffs' Non-Infringing Products do not meet all limitations of
10 claim 11, at least because they lack the "the right sidewall comprising a third right
11 panel" limitation.

12 37. Plaintiffs' Non-Infringing Products do not meet all limitations of
13 claim 15, at least because they lack the limitation that "the rigid top cover has an
14 indentation pattern being at least substantially aligned with the vertical axis of the
15 wheel assembly."

16 38. An actual and justiciable case or controversy therefore exists between
17 Plaintiffs and Defendant regarding whether the Non-Infringing Products have
18 infringed the claims of the '576 Patent. Declaratory relief is thus appropriate and
19 necessary to establish that the making, using, importation, sale, or offer of sale of
20 the Non-Infringing Products do not infringe, directly or indirectly, literally or under

1 the doctrine of equivalents, any valid and enforceable claim of the '576 Patent.
2 Plaintiffs are entitled to a judgment declaring that they have not infringed and will
3 not infringe any claim of the '576 Patent.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs pray for the following relief:

6 A. A judgment declaring that the manufacture, use, offer for sale, sale,
7 and/or importation of Plaintiffs' products have not infringed and will not infringe,
8 directly or indirectly, literally or under the doctrine of equivalents, any valid claim
9 of the '576 Patent; and

10 B. Such other and further relief as this Court may deem just and proper.

11
12 **DEMAND FOR JURY TRIAL**

13 Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial
14 by jury on all claims and issues so triable.

15
16
17 DATED: December 12, 2024

SHM LAW FIRM

18 By: /s/ Qianwu Yang

QIANWU YANG (Cal. Bar No. 336610)

yang@shm.law

19 YI YI (Cal. Bar No. 353482)

yi.yi@shm.law

20 **SHM LAW FIRM**

1 3000 El Camino Real
2 Building 4, Suite 200
3 Palo Alto, CA 94306
4 Telephone: (650) 613-9737

5 *Attorneys for Plaintiffs*
6 iBeauty Limited Company,
7 Dongguan Xianghuo Trading Co., Ltd.,
8 Dongguan Laiyang Trading Co., Ltd.,
9 Guangzhou Linyu Trading Co., Ltd.,
10 Guangzhou Lincan Electronic Technology
11 Co., Ltd., and
12 Guangzhou Senran Electronic Technology
13 Co., Ltd.
14
15
16
17
18
19
20